



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MWG
F. #2022R00544

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 26, 2023

By ECF

The Honorable Hector Gonzalez
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Christopher Gunn
Criminal Docket No. 22-314 (HG)

Dear Judge Gonzalez:

The government respectfully submits this letter to join in the defendant's request to adjourn the status conference currently scheduled for April 27, 2023. Further, in light of the defendant's pending motion to dismiss, as well as the parties' continued negotiations over the terms of a potential deferred prosecution agreement, the government respectfully requests that the Court exclude time under the Speedy Trial Act between April 27, 2023, and a control date of June 2, 2023. The government submits that such exclusion of time is appropriate in light of the pending motion to dismiss and, given the ongoing negotiations regarding a deferred prosecution agreement, would serve the ends of justice. See 18 U.S.C. §§ 3161(h)(1)(D), 3161(h)(7).

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Michael W. Gibaldi
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cc: Clerk of the Court (HG) (by ECF)
Counsel of Record (by ECF)